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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
(LAS VEGAS)**

KIRSTEN ANN SADLER,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

)  
) Case No.: 2:24-cv-01096-MDC  
)

) **STIPULATION TO VOLUNTARY**  
) **REMAND PURSUANT TO SENTENCE**  
) **FOUR OF 42 U.S.C. § 405(g) AND TO**  
) **ENTRY OF JUDGMENT FOR**  
) **PLAINTIFF**  
)  
)  
)

The parties, through their respective counsel, hereby stipulate and agree that the above-captioned case be reversed and remanded to the Commissioner of Social Security for a hearing before an Administrative Law Judge (ALJ) and a new decision in regard to Plaintiff's applications for disability benefits. On remand, the ALJ will take any necessary action to complete the administrative record, offer Plaintiff a hearing, reevaluate the medical opinions and prior administrative medical findings, reevaluate Plaintiff's RFC, as needed, continue the sequential evaluation process, obtaining

1 vocational expert testimony as warranted, and resolving any conflicts between the Dictionary of  
2 Occupational Titles, the vocational expert testimony, and the RFC, and issue a new decision.

3 The parties stipulate that this remand be made pursuant to sentence four of 42 U.S.C. § 405(g),  
4 and that Plaintiff may be entitled to reasonable attorney fees and costs pursuant to the Equal Access to  
5 Justice Act, 28 U.S.C. § 2412(d), upon proper request to this Court.

6 The parties further request that the Clerk of the Court be directed to enter a final judgment in favor  
7 of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

8 DATED this 12th day of August 2024.

9  
10 Respectfully submitted,

11 JASON M. FRIERSON  
12 United States Attorney

13 MATHEW W. PILE  
14 Associate General Counsel  
15 Office of Program Litigation, Office 7  
16 Social Security Administration

17 s/ Franco L. Becia

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1 DATED this 12th day of August 2024.

2 s/ Franco L. Becia For  
3 LEONARD STONE and MARC KALAGIAN  
4 Attorneys for Plaintiff  
5 (PER EMAIL AUTHORIZATION)

6 IT IS SO ORDERED:

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10 Hon. Maximiliano D. Couvillier III  
11 UNITED STATES MAGISTRATE JUDGE  
12 DATED: 8/13/24  
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